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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

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16 JILL LEOVY, NICHOLAS GUILAK,) CASE NO.: 3:23-cv-03440-AMO
CAROLINA BARCOS, PAUL MARTIN,)
17 MARILYN COUSART, ALESSANDRO DE LA) DECLARATION OF MAURA L.
TORRE, VLADISLAV VASSILEV, JANE) REES IN SUPPORT OF
DASCALOS, and minor G.R., individually, and) DEFENDANT'S ADMINISTRATIVE
on behalf of all other similarly situated,) MOTION TO CONSIDER
Plaintiffs,) WHETHER CASES SHOULD BE
v.) RELATED
18 GOOGLE LLC,)
19 Defendant.)
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Judge: Hon. Araceli Martínez-Olguín

1 I, Maura L. Rees, declare as follows:

2 1. I am an attorney and a partner at the law firm of Wilson Sonsini Goodrich &
 3 Rosati, P.C., counsel for Defendant Google LLC (“Google”) in this matter. I submit this
 4 declaration in support of Google’s Administrative Motion to Consider Whether Cases Should be
 5 Related (“Admin Motion”). I have personal knowledge of the facts set forth herein and, if called
 6 as a witness, I could and would testify competently thereto.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of the Complaint in
 8 *Zhang, et al. v. Google LLC, et al.*, Case No. 5:24-cv-02531-EJD (“Zhang”), filed on April 26,
 9 2024. In the Complaint, Plaintiffs Jingna Zhang, Sarah Andersen, Hope Larson, and Jessica Fink
 10 assert that Google directly infringed their copyrights by training its Generative AI models on
 11 their copyrighted content.

12 3. On May 16, I connected by email with Christopher Young of Joseph Saveri Law
 13 Firm, counsel for Plaintiffs in the *Zhang* action, to meet and confer about the issues raised in this
 14 motion. On May 17, 2024, I spoke by telephone with Mr. Young about these issues. We
 15 discussed the criteria for relation under Civ. L.R. 3-23, and Mr. Young indicated that the *Zhang*
 16 Plaintiffs were likely to oppose the motion. Mr. Young confirmed this position by email on May
 17 20, stating that “the core of *Leovy* appears to center around a different model and the theories of
 18 harm involve different materials and different law.”

19 4. On May 17, my colleague, Eric Tuttle, contacted Yana A. Hart of Clarkson Law
 20 Firm, counsel for Plaintiffs in this action, to meet and confer about the issues raised in this
 21 motion. Mr. Tuttle and Ms. Hart spoke by telephone about these issues on May 20. Ms. Hart
 22 indicated that she would consider the issues further and provide Plaintiffs’ position. After
 23 following up by email on May 29 and May 30, Mr. Tuttle and my colleague David Kramer again
 24 spoke with counsel for Plaintiffs in this action about these issues on May 30. On the evening of
 25 May 30, Ms. Hart responded via email that Plaintiffs in this action intend to oppose, stating that
 26 “the nature and the scope of the claims and allegations are not substantially the same.”

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed on May 31, 2024 at Palo Alto, California.

3 /s/ Maura L. Rees
4 Maura L. Rees
5 mrees@wsgr.com

6 *Counsel for Defendant*

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SIGNATURE ATTESTATION

I, David H. Kramer, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

By: /s/ David H. Kramer
David H. Kramer